

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

MARLON BOWLES

Plaintiff,

vs.

ABBVIE INC.,

Defendant.

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Cause No: 1:20-cv-07413

UNOPPOSED MOTION FOR EXTENSION OF BRIEFING DEADLINES

COMES NOW, Plaintiff Marlon Bowles, by and through his undersigned counsel and files this Unopposed Motion for Extension of Briefing Deadlines and hereby request this Court grant additional time to file Plaintiff's response and Defendant AbbVie, Inc's reply briefs, and states:

1. Defendant AbbVie, Inc.'s Motion to Dismiss Plaintiff's Second Amended Complaint [Dkt. No. 40] was filed on May 13, 2021.
2. Request is hereby made that the deadline for the Plaintiff to file his response to Defendant AbbVie, Inc's Motion to Dismiss Plaintiff's Second Amended Complaint be moved from June 28, 2021 to **July 28, 2021**.
3. Request is hereby made that the deadline for Defendant AbbVie, Inc. to file any reply to Plaintiff's Response to Defendant AbbVie, Inc.'s Motion to Dismiss Plaintiff's Second Amended Complaint be moved from July 16, 2021 to **August 16, 2021**.
4. Counsel for Plaintiff has conferred with opposing counsel, who has no objection to the relief sought.

5. This Court is permitted to enlarge the time period allowed for filing pleadings pursuant to FED. R. CIV. P. 6(b). Plaintiff submits that no party will be prejudiced by the granting of a brief extension. Based on the discussions of the Parties, if the Court grants this motion, there may be no need ultimately to file a response.

WHEREFORE, PREMISES CONSIDERED, Plaintiff requests that this Court exercise its discretion by allowing the parties to extend the current briefing deadlines as set forth above and grant such other relief to which they may be entitled.

Dated: June 25, 2021

Respectfully Submitted,

VAN WEY, PRESBY & WILLIAMS, PLLC

BY: /s/ Susan Allen

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COUNSEL FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

Counsel for Plaintiff, Susan Allen, has conferred with Counsel for Defendant regarding the substance of this Unopposed Motion for Extension of Briefing Deadlines. Counsel for Defendant is in agreement with the Proposed Briefing Schedule.

/s/ Susan Allen
Susan Allen